

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERRY DEAN WRIGHT, JR.,

[DOB: 04-12-1976]

JESUS VALDEZ,

[DOB: 04-17-1981]

CESAR RAMON AVILA-HERNANDEZ,

[DOB: 07-22-1987]

SALVADOR CAMPOS,

[DOB: 12-03-1981]

JOSEPH A. DRECKMEIER,

[DOB: 08-11-1981]

TIMOTHY EDWARD HOWER,

[DOB: 08-30-1977]

PERRY L. ADAMS,

[DOB: 05-30-1975]

SHANNON K. WRIGHT,

[DOB: 02-09-1977]

PHILIP J. DELGROSSO,

[DOB: 12-11-1951]

and

JEFFREY A. CAIN,

[DOB: 07-28-1975]

Defendants.

No. 13-03054-01/14-CR-S-BCW

COUNT 1

21 U.S.C. § 841(a)(1) and (b)(1)(A) and § 846

NLT 10 Years Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT 2

21 U.S.C. § 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

COUNT 3

21 U.S.C. § 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT 4

18 U.S.C. § 1956(a)(1)(A)(i) and (h)

NMT 20 Years Imprisonment

NMT \$500,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT 5

18 U.S.C. § 1956(a)(1)(B)(i)

NMT 20 Years Imprisonment

NMT \$500,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS 6, 7, 8, & 9

18 U.S.C. § 1957

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Defendants/Counts

J. Wright: 1, 4, 5, 6, 7, 8, 9, FA1

J. Valdez: 1, 3

C. Avila-Hernandez: 1, 3, FA2

S. Campos: 1, 3

J. Dreckmeier: 1, 4, 8

T. Hower: 1

P. Adams: 1, 2, 4, 5, FA3

S. Wright: 1, 4, 8, FA1

P. Delgrosso: 1, 4, 7, 9, 10

J. Cain: 1, 4, 6

Class C Felony

COUNTS 10

31 U.S.C. §§ 5331 and 5322

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

FORFEITURE ALLEGATIONS 1, 2 & 3

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 500 Grams or More of a Mixture or Substance
Containing a Detectable Amount of Methamphetamine)

21 U.S.C. § 841(a)(1) and (b)(1)(B) and § 846

Beginning on an unknown date, but at least as early as September 4, 2012, and continuing to on or about June 5, 2013, in Greene County, Christian County, and Webster County, in the Western District of Missouri, and elsewhere, the defendants, **JERRY DEAN WRIGHT, JR., JESUS VALDEZ, CESAR RAMON AVILA-HERNANDEZ, SALVADOR CAMPOS, JOSEPH A. DRECKMEIER, TIMOTHY EDWARD HOWER, PERRY L. ADAMS, SHANNON K. WRIGHT, PHILIP J. DELGROSSO, and JEFFREY CAIN**, knowingly and intentionally conspired and agreed with each other and with others known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A), all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(C)

On or about April 1, 2013, in Greene County, in the Western District of Missouri, the defendant, **PERRY L. ADAMS**, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)
21 U.S.C. § 841(a)(1) and (b)(1)(A)

On or about June 5, 2013, in Greene County and Webster County, in the Western District of Missouri, the defendants, **JESUS VALDEZ, CESAR RAMON AVILA-HERNANDEZ, SALVADOR CAMPOS**, and others known and unknown to the grand jury, knowingly and intentionally possessed with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

COUNT 4

(Conspiracy to Commit Money Laundering)
18 U.S.C. § 1956(a)(1)(A)(i) and (h)

Beginning on an unknown date, but at least as early as February 2, 2013, and continuing through at least May 23, 2013, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **JERRY DEAN WRIGHT, JR., JOSEPH A. DRECKMEIER, PERRY L. ADAMS, SHANNON K. WRIGHT, PHILIP J. DELGROSSO**, and **JEFFREY CAIN**, knowingly and intentionally conspired and agreed with each other, and with other persons known and unknown to the Grand Jury, to commit money laundering.

It was the purpose and object of the conspiracy to knowingly and willfully conduct and attempt to conduct financial transactions affecting interstate commerce which involved the proceeds of a specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1).

The defendants knowingly conducted financial transactions affecting interstate commerce involving the proceeds of a specified unlawful activity, with the intent to promote the carrying on of the distribution of methamphetamine, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1)(A)(i), all in violation of Title 18, United States Code, Section 1956(h).

COUNT 5

(Engaging in Monetary Transactions to Conceal Unlawful Activity)

18 U.S.C. § 1956(a)(1)(B)(i)

On or about March 7, 2013, in Greene County, in the Western District of Missouri, the defendants, **JERRY DEAN WRIGHT, JR.** and **PERRY L. ADAMS**, aiding and abetting each other, knowingly conducted and attempted to conduct a financial transaction affecting interstate and foreign commerce, to wit: a payment, in that, the defendants paid approximately \$29,600 in United States Currency to Springfield Imports toward the purchase of a black 2012 Chevrolet Camaro bearing Vehicle Identification Number 2G1FT3DW4C9106584 in the name Perry L. Adams, which payment involved the proceeds of specified unlawful activity, that is, the illegal distribution of methamphetamine, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct

such financial transaction, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), and 2.

COUNT 6

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)
18 U.S.C. § 1957

On or about March 13, 2013, in Greene County and Clay County, in the Western District of Missouri, the defendants, **JERRY DEAN WRIGHT, JR.** and **JEFFREY CAIN**, aiding and abetting each other, did knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000, which property was in fact derived from specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1); to wit: the payment of approximately \$13,700 in United States Currency toward the purchase of a black 2005 Pontiac GTO bearing Vehicle Identification Number 6G2VX12U05L405666, in violation of Title 18, United States Code, Sections 1957, and 2.

COUNT 7

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)
18 U.S.C. § 1957

On or about April 4, 2013, in Christian County, in the Western District of Missouri, the defendants, **JERRY DEAN WRIGHT, JR.** and **PHILIP J. DELGROSSO**, aiding and abetting each other, did knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000, which property was in fact derived from specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1); to wit: the purchase of a cashier's check or money order valued at approximately \$47,848 from Regions

Bank for the purchase of a 2010 Dodge Challenger and a 2010 Chevrolet Camaro, in violation of Title 18, United States Code, Sections 1957, and 2.

COUNT 8

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)
18 U.S.C. § 1957

On or about April 8, 2013, in Greene County, in the Western District of Missouri, the defendants, **JERRY DEAN WRIGHT, JR., JOSEPH A. DRECKMEIER**, and **SHANNON K. WRIGHT**, aiding and abetting each other, did knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000, which property was in fact derived from specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1); to wit: the payment of approximately \$43,000 in United States Currency to Reliable Chevrolet toward the purchase of a 2013 Chevrolet Camaro bearing Vehicle Identification Number 2G1FZ1EP9D9805074, in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT 9

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)
18 U.S.C. § 1957

On or about April 11, 2013, in Christian County, in the Western District of Missouri, the defendants, **JERRY DEAN WRIGHT, JR.** and **PHILIP J. DELGROSSO**, aiding and abetting each other, did knowingly engage and attempt to engage in a monetary transaction, in and affecting interstate commerce, in criminally derived property of a value greater than \$10,000, which property was in fact derived from specified unlawful activity, that is, the distribution of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1); to wit: the purchase of a cashier's check or money order valued at approximately \$14,000 from Regions

Bank for the purchase of a 2008 Chevrolet Avalanche bearing Vehicle Identification Number 3GNFK12358G221965, in violation of Title 18, United States Code, Sections 1957, and 2.

COUNT 10
(Failure to File Form 8300)
31 U.S.C. §§ 5331 and 5322

On or about April 4, 2013, in Christian County, in the Western District of Missouri, the defendant, **PHILIP J. DELGROSSO**, a person engaged in a trade or business, received more than \$10,000.00 in United States currency in a transaction in the course of such trade or business, and did willfully fail to file a report, that is: Form 8300, with the Financial Crimes Enforcement Network (FinCEN) as required under Section 5331 of Title 31, and any regulation prescribed under any such section, all in violation of Title 31, United States Code, Sections 5331 and 5322, and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION 1
21 U.S.C. § 853

The allegations contained in Count 1, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the violation alleged in Count 1, the defendants, **JERRY DEAN WRIGHT, JR.** and **SHANNON K. WRIGHT**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the said defendants obtained, directly or indirectly, as a result of the said violation, and any and all of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violation, including but not limited to:

1. A silver 1998 Jaguar bearing Vehicle Identification Number SAJHX1241WC832783, seized on or about June 5, 2013;
2. A black and orange 2003 Harley Davidson motorcycle bearing Vehicle Identification Number ARKAVMC0330000193, seized on or about June 5, 2013;
3. A silver and black 2003 Harley Davidson motorcycle bearing Vehicle Identification Number 1HD1BMY463Y050676, seized on or about June 5, 2013;
4. A red 2004 Chevrolet SSR bearing Vehicle Identification Number 1GCES14RP84B108793, seized on or about June 5, 2013;
5. A black 2005 Pontiac GTO bearing Vehicle Identification Number 6G2VX12U05L405666, seized on or about June 5, 2013;
6. A black 2006 Chrysler 300C bearing Vehicle Identification Number 2C3LA73W06H371817, seized on or about June 5, 2013;
7. A gold 2007 Chevrolet Avalanche bearing Vehicle Identification Number 3GNEC12017G110617, seized on or about June 6, 2013;
8. A black 2008 Chevrolet Avalanche bearing Vehicle Identification Number 3GNFK12358G221965, seized on or about June 5, 2013;
9. A blue 2009 Chevrolet Avalanche bearing Vehicle Identification Number 3GNFK12049G155657, seized on or about June 5, 2013;
10. A silver 2010 Chevrolet Camaro bearing Vehicle Identification Number 2G1FS1EW1A9203020, seized on or about June 5, 2013;
11. A maroon 2010 Chevrolet Camaro bearing Vehicle Identification Number 2G1FK1EJ1A9149464, seized on or about June 5, 2013;
12. A purple 2010 Dodge Challenger bearing Vehicle Identification Number 2B3CJ5DT4AH296344, seized on or about June 5, 2013;
13. A black 2012 Chevrolet Camaro bearing Vehicle Identification Number 2G1FT3DW4C9106584, seized on or about June 5, 2013;
14. A pearl 2013 Chevrolet Avalanche bearing Vehicle Identification Number 3GNTKGE7XDG267158, seized on or about June 5, 2013;

FORFEITURE ALLEGATION 2
21 U.S.C. § 853

The allegations contained in Count 1, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the violation alleged in Count 1, the defendant, **CESAR RAMON AVILA-HERNANDEZ**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the said defendants obtained, directly or indirectly, as a result of the said violation, and any and all of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violation, including but not limited to:

1. A white Cadillac Escalade bearing Vehicle Identification Number CA970345, seized on or about June 5, 2013; and
2. Approximately \$5,700 in United States currency seized on or about June 5, 2013.

FORFEITURE ALLEGATION 3
21 U.S.C. § 853

The allegations contained in Count 1, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the violation alleged in Count 1, the defendant, **PERRY L. ADAMS**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the said defendants obtained, directly or indirectly, as a result of the said violation, and any and all of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of,

the said violation, including but not limited to, black 2012 Chevrolet Camaro bearing Vehicle Identification Number 2G1FT3DW4C9106584, seized on or about June 5, 2013.

A TRUE BILL.

/s/
FOREPERSON OF THE GRAND JURY

/s/ Gary Milliagn
GARY MILLIGAN
Assistant United States Attorney

Date: 05/06/2014